

## UNITED STATES DISTRICT COURT

for the

Northern District of TexasFort Worth DivisionCV-2023-01037-0  
11-20-23Case No. 4:23-cv-01037-0  
(to be filled in by the Clerk's Office)Jury Trial: (check one) ☒ Yes ☐ No

? The legal Board members  
of the APBPA will testify  
they are not suing me, so  
Plaintiff(s) we don't know  
(Write the full name of each plaintiff who is filing this complaint. Who  
If the names of all the plaintiffs cannot fit in the space above, is  
please write "see attached" in the space and attach an additional  
page with the full list of names.)  
-v- the APBPA?

Jennifer Madison  
Defendant(s)

(Write the full name of each defendant who is being sued. If the  
names of all the defendants cannot fit in the space above, please  
write "see attached" in the space and attach an additional page  
with the full list of names.)

## THE DEFENDANT'S ANSWER TO THE COMPLAINT

## I. The Parties Filing This Answer to the Complaint

Provide the information below for each defendant filing this answer or other response to the allegations in the plaintiff's complaint. Attach additional pages if needed.

Name	<u>Jennifer Sharon Madison</u>
Street Address	<u>33101 S Canyon Rd #</u>
City and County	<u>Black Canyon City, AZ Yavapai</u>
State and Zip Code	<u>Arizona 85304</u>
Telephone Number	<u>(480) 341-6558</u>
E-mail Address	<u>jmadisonaz@gmail.com</u>

## II. The Answer and Defenses to the Complaint

## A. Answering the Claims for Relief

On a separate page or pages, write a short and plain statement of the answer to the allegations in the complaint. Number the paragraphs. The answer should correspond to each paragraph in the complaint, with paragraph 1 of the answer corresponding to paragraph 1 of the complaint, etc. For each paragraph in the complaint, state whether: the defendant admits the allegations in that paragraph; denies the allegations; lacks sufficient knowledge to admit or deny the allegations; or admits certain allegations but denies, or lacks sufficient knowledge to admit or deny, the rest.

- Please see attached.

**B. Presenting Defenses to the Claims for Relief**

Write a short and plain statement identifying the defenses to the claims, using one or more of the following alternatives that apply.

1. The court does not have subject-matter jurisdiction over the claims because (briefly explain why there is no federal-question jurisdiction or diversity-of-citizenship jurisdiction; see the complaint form for more information)  
 - The APBPA is not a legal 501C3 currently with the State of AZ or the IRS.  
 legal  
 The Board Members of the APBPA past and present, are ready to testify they aren't
2. The court does not have personal jurisdiction over the defendant because (briefly explain) <sup>Swing me</sup>  
 Those swing me cannot prove anyone elected them because they are pretending they were elected. Not one legal Board members for them.
3. I am on medical leave since 9/2020 with \$0 income in over three years and I'm trying not to die of my injury.  
 The venue where the court is located is improper for this case because (briefly explain)  
 The APBPA is a CA and AZ registered organization only since 1924.
4. The defendant was served but the process-the form of the summons-was insufficient because (briefly explain)  
 I was not home, nor was anyone who lived at my home. I'm in hiding at a different location for my safety from the Plaintiffs harassing me for
5. The manner of serving the defendant with the summons and complaint was insufficient because (briefly explain)  
 Standing up to their illegal activities and from their friend, my former boss, who catastrophically hurt me, and has been texting, and calling with death threats. They threw the papers over a locked gate, at a
6. The complaint fails to state a claim upon which relief can be granted because (briefly explain why the facts alleged, even if true, are not enough to show the plaintiff's right to recover)  
 There's been \$0 income or damages, I'm legally employed by the APBPA, and have been since 2017. We tried to fundraise for a lawyer and to help the assistance recipients and they filed the lawsuit, maliciously and vexatiously to keep us from getting a judge to make them return property and passwords they stole from the APBPA illegally using the APBPA logo with no legal authority to do so.  
 malinois dogs, with the 17 yr old dog sitter. The dogs tore up the docs in front of the server.
7. Another party (name) <sup>Nate Miller</sup> needs to be joined (added).  
 in the case. The reason is (briefly explain why joining another party is required)

- a. If the basis for subject-matter jurisdiction is diversity of citizenship, state the effect of adding the other party:
- The other party is a citizen of the State of (name) \_\_\_\_\_.
- Or is a citizen of (foreign nation) \_\_\_\_\_. The amount of damages sought from this other party is (specify the amount) \_\_\_\_\_.
- b. If the claim by this other party is based on an alleged violation of a federal constitutional or statutory right, state the basis:

### C. Asserting Affirmative Defenses to the Claims for Relief

Identify an affirmative defense or avoidance that provides a basis for the defendant to avoid liability for one or more of the plaintiff's claims even if the basis for the claim is met. Any affirmative defense or avoidance must be identified in the answer. Include any of the following that apply, as well as any others that may apply.

The plaintiff's claim for (specify the claim)

any damages

is barred by (identify one or more of the following that apply):

1. Accord and satisfaction (briefly explain)

2. Arbitration and award (briefly explain)

3. Assumption of risk (briefly explain) I'm 100% catastrophically and permanently disabled and about to lose my home to foreclosure. I have 0 assets and \$0 income and no ability to earn future income with my
4. Contributory or comparative negligence of the plaintiff (briefly explain) injury per my doctors.

5. Duress (briefly explain)

Plaintiffs are illegally obstructing my workers comp claim for years and death threatening me if I don't let them steal the APBPA as they weren't elected by board members.

6. Estoppel (briefly explain)

7. Failure of consideration (briefly explain)

Fraud (briefly explain)

The plaintiffs are committing fraud. They were not elected, and are banned from the APBPA by the Board.

Illegality (briefly explain)

The plaintiffs are breaking several federal and state laws. They are stealing APBPA funds with no legal authority and impersonating the APBPA.

10. Injury by fellow employee (briefly explain)

Their friend, my former boss, catastrophically injured me at work and its most likely fatal.

11. Laches (Delay) (briefly explain)

12. License (briefly explain)

13. Payment (briefly explain)

14. Release (briefly explain)

15. Res judicata (briefly explain)

Several open law enforcement investigations into plaintiffs by FBI, AZ AG, DA, Police, FBI, 9th Dept of Justice

16. Statute of frauds *(briefly explain)*

Plaintiffs committing fraud

17. Statute of limitations *(briefly explain)*

18. Waiver *(briefly explain)*

19. Other *(briefly explain)*

**D. Asserting Claims Against the Plaintiff (Counterclaim) or Against Another Defendant (Cross-Claim)**

For either a counterclaim against the plaintiff or a cross-claim against another defendant, state briefly the facts showing why the defendant asserting the counterclaim or cross-claim is entitled to the damages or other relief sought. Do not make legal arguments. State how each opposing party was involved and what each did that caused the defendant harm or violated the defendant's rights, including the dates and places of that involvement or conduct. If more than one counterclaim or cross-claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. The defendant has the following claim against the plaintiff *(specify the claim and explain it; include a further statement of jurisdiction, if needed)*:

obstruction of my civil rights  
with my workers comp case.  
Harassment, death threats, slander,  
libel, loss of enjoyment of life, stressing a

2. The defendant has the following claim against one or more of the other defendants *(specify the claim and explain it; include a further statement of jurisdiction, if needed)*:

They most likely will be  
going to prison as they are  
stealing from the APBPA  
without being elected.

dying  
injured  
employee  
on medical  
leave since  
9/2020

3. State briefly and precisely what damages or other relief the party asserting a counterclaim or cross-claim asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons that are alleged to entitle the party to actual or punitive money damages.

- a. The defendant asserting the counterclaim or cross-claim against *(specify who the claim is against)* Kameron Loe and alleges that the following injury or damages resulted *(specify)*: Kevin Simmons — actual Plaintiffs  
damage to my cervical injury  
damage to my home, garage, camper  
dogs, daughter, friend, APBPA, and
- b. The defendant seeks the following damages or other relief *(specify)*: stolen property and passwords  
Everything I am rightfully allowed by law.  
At least \$1 million in damages to my reputation and the APBPA and its employees please.

### III. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this answer: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the answer otherwise complies with the requirements of Rule 11.

#### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/14/23

Signature of Defendant

Printed Name of Defendant

Jennifer Madison  
Jennifer Madison

#### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Pro Se 3 (Rev. 12/16) The Defendant's Answer to the Complaint

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Telephone Number

(480) 341-6558

E-mail Address

jmadisonaz@gmail.com

From: Jennifer Madison jmadisonaz@gmail.com  
Subject: Civil Action No. 4:23-cv-01037-0-please confirm receipt  
Date: Nov 14, 2023 at 3:11:24 AM  
To: gfanher@bwwlaw.com, Howie Bedell jadedell@comcast.net  
Bcc: natemiller451@gmail.com

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Dear Honorable District Court Judge and Mr. Fancher,

I'm hereby respectfully submitting my motion, please, for a continuance, or reasonable extension of time, to respond to or mediate this lawsuit, with experienced counsel, considering the 99 year old APBPA nonprofit, who I am still, in writing, requested by the legal Board Members, to be on the current APBPA Advisory Board for, and I'm not fired from, nor have I legally resigned in writing from the APBPA, and I've been employed by the APBPA, and it's legal Board Members since 2017, and it, too, is very much at stake here, with any and all Court decisions, involving it's legal name and logo.

Moreover, Mr. Fancher's client's, are not by any stretch, legal APBPA Board members, nor current legal employees of the APBPA, and as such, cannot bring lawsuits on behalf of the APBPA. They cannot legally prove they have been elected to any APBPA positions by the legal APBPA Board Members, past or present, as they're claiming, because they legally have not, which we have Kameron Loe and Kevin Simmons, under oath in front of a Judge in AZ workers comp hearings, fully admitting as such.

The Association of Professional Ball Players of America, formed by Lou Gehrig and Babe Ruth and others in 1924, is very much at stake, along with the 30+ monthly APBPA assistance recipients and their families, who rely on the APBPA's ongoing monthly financial assistance, to not go homeless every month, with the decision of this Court, even though it's solely the APBPA trademark usage being litigated, as this lawsuit was filed vexatiously and maliciously, solely in an attempt to legitimize individuals who are, in actuality, banned by the legal Board Members of the APBPA, and who cannot possibly achieve legitimacy any other way.

Mr. Fancher's clients were not elected by the legal APBPA Board Members, and currently have multiple open law enforcement and government agency investigations open against them for this matter, that the legal APBPA Board Members please request be allowed to continue unabated, as their outcomes should fully free up the Court's schedule, as we expect a full dismissal, without prejudice, once charges are

legally pressed against Mr. Fancher's clients which we realistically expect very shortly, considering the over abundance of evidence against them.

These open law enforcement investigations, realistically, will be sending both of Mr. Fancher's clients to prison, as they're willfully breaking multiple federal and state laws, and utilizing stolen APBPA assistance funds, without being currently employed by the APBPA, while seriously and willfully not helping the 30+ monthly APBPA assistance recipients, and willfully obstructing the legal APBPA Board Members, that they achieved with an illegal hacking of APBPA systems and forged documents, utilizing the APBPA logo, to fund this lawsuit and pay Mr. Fancher's legal fees.

Furthermore, Mr. Fancher's clients, after blatantly and illegally stealing APBPA assistance funds, have chosen to fund vexatious and malicious lawsuits, with those stolen funds, against current employees, such as myself, and 26 others, who are solely standing up to their blatant illegal hacking of the APBPA.

In addition, my three year ongoing workers compensation case, is also being litigated with the APBPA, whose legal Board Members are 100% for my getting my workers compensation benefits finally, and this Court's decision, if I'm forced to litigate in my seriously handicapped condition, can negatively and seriously affect my Civil Rights in that case.

I'm severely handicapped, and I'm going to request that this format please be acceptable as such, as my hands aren't working well enough anymore, to fill out the required legal format documents by hand.

I've tried, and I've called free legal help ad nauseum, but everyone is too backlogged to help me right now, and I haven't had any income in over 3 years, and I'm facing imminent December 10th foreclosure of my beloved home, due to Mr. Fancher's clients' illegal hacking of the APBPA, and retaliatory obstruction of my workers comp case, so I can't pay anyone to help me.

I cannot handwrite legibly anymore, I'm extremely dizzy, and neuro fatigued, and I'm having increasing visual difficulties seeing at all, including seeing static and virtual snow, that my neuro optometrist believes is a blood flow issue to my brain, from my industrial degenerating brain injury, which is also showing up on my QEEG scans, with my brain not getting enough blood flow so this is genuinely the best I can do.

I'm also too injured, in pain, and seriously handicapped with this injury most likely being fatal, to be doing any work, according to my entire team of medical doctors. I'm in serious worsening, most likely terminal shape and very poor financially so I haven't found anyone to help me deal with this yet.

Please bear with me.

I am diagnosed by my team of medical doctors, with a degenerating, most likely fatal, brain, cervical, and spine, work caused injury, that my former boss with the APBPA did to me in the office, in 2017, and hospice has approved me, with my symptoms and last Honor Health ER report.

I've chosen to delay entering hospice as long as I currently can, as my health insurance will not let me get treated further when I do, but to try to fight to be alive with my children as long as possible, but per Honor Health ER doctors, I cannot be given oxygen or anything medically, to make me more comfortable, as it will further weaken the generalized weakening my entire body is experiencing, from my catastrophic work injury. I'm not allowed to stress at all, by my team of doctors, as stress makes my symptoms markedly worse.

I cannot breath fully, with any breath, which is medically documented for over three years, which is worsening, especially with any stress, or effort to verbally communicate, which has left me uncomfortably gasping like a fish, and when it's gotten worse over the years, the last ER visit where I went because my not being able to breathe is causing me so much physical distress, the doctors said I have a degenerating entire body weakness from my work injury worsening, which is causing

my breathing to shut down increasingly.

My medical doctors, including my neuro optometrist, believe I'll most likely suffocate at any time like this, or I'm at imminent risk of a heart attack or stroke. My brain is already accepted into brain injury research, post mortem, with Dr. McKee's team in Boston and the World brain bank to hopefully help science learn from my specific concussion injury so you fully appreciate the seriousness of my injury I'm trying to survive currently.

That said, please be as kind and cordial as possible in all correspondence, as I'm not allowed to stress at all medically. I most likely cannot survive the stress of any malicious litigation, per my team of doctors, as I've been worsening on medical leave from the APBPA since 9/2020. Sudden stressors make me lose my center field of vision for days at a time. This is all extremely terrifying to be experiencing.

I also say this, so you please bear with what I'm putting before you. If I say anything I'm not allowed factually to say, by law, please kindly correct me. As I'm Pro Se, until I can hire a lawyer, I absolutely want to only follow and respect the rules and all parties involved. The trademark lawyer we spoke with today agreed to accept the APBPA's Board Members' case, but wants \$15,000 as a retainer and says to unpack this in Court most likely would cost \$150,000 to litigate which I, and we, don't have and the APBPA illegally stolen assistance funds shouldn't and cannot be funding either.

My serious brain injury affects how I communicate so here are the facts as I know them, that must please be taken into consideration, not as much for my own fate in this, but the fate of the 99 yr old nonprofit I work for, as if this is fully litigated the facts will support, that this lawsuit is vexatious and malicious, filed by Kameron Loe mostly, who is motivated by two reasons in this.

One, Kameron's personal business catastrophically failed in 2020, resulting in a \$200,000 personal judgment from 8/2021. He hacked into the APBPA in 9/2021 illegally and improperly for his own benefit. Kameron has been banned, since 2020,

from the APBPA for his own blatant malfeasance within the APBPA, as witnessed and documented by the Board and witnesses.

Two, he is friends with, and part of the Baseball Brotherhood, as they call it, with the retaliatory former boss, who did this injury to me, who I got an injunction against harassment from, there's texted and transcribed vmail death threats from him to me, in the file I'm sending to you now, Mr. Fancher, and also witness statements from an umpire who has worked with me and our Board since 2018, and witnessed me staying with an undercover Phoenix police office, due to the worsening ongoing threats from Kameron Loe and his friend, my former boss, who did this injury to me, as they badly want to silence me, so the details of abuses I suffered, working for my former boss, do not come to light, and hurt their "Brotherhood" in any way.

I don't wish harm on anything or anyone. I'm only seeking my lawful workers compensation benefits, and I do not blame my employer, the APBPA, for my former boss injuring me. It happened, and it needs to be covered by the workers comp insurance company who is now liable, is all.

To what end do your clients wish to sue me, Mr. Fancher, as you can clearly see by all my actions in life, that I'm not ever retaliating against the APBPA, I haven't had any income in over three years due to your clients' willful and illegal obstruction of my workers comp settlement, and I'm most likely dying from my work injury according to all my medical doctors. Is it to cruelly torture my last days on earth without mercy, and deny me that time with my children, and force me to work for your clients, while I'm on documented medical leave from work, since 9/2020, because there's no other reason to sue me, as suing me is not going to make it magically appear that any legal APBPA Board Members elected your clients. Even if you magically won judgments against me, it doesn't magically make me ever able to pay you or your clients, as I'm penniless and about to be homeless, so to what end are we in Federal Court over this? Realistically what damages have I ever done to the APBPA, or your clients, other than stating the lawful facts about them and their illegal activities as they are actively illegally impersonating and hacking the APBPA.

I promise in writing to never utilize the APBPA logo without the legal Board first directing me to, which is all I've ever done from day one, you'll discover. So no Judge is necessary to enforce usage of the APBPA logo unless it's to try to legitimize your clients because there's no other way for them to show all the 101,800 members involved that they have any legal claim to the APBPA logo or assistance funds. That's the root cause of this lawsuit and what your clients are seeking, Mr. Fancher.

Nevertheless, my former boss with the APBPA, and Kameron, have been deemed extremely dangerous, due to their behavior within the APBPA, and as they became increasingly retaliatory, after their being banned for their own malfeasance as witnessed by the Board, and their extreme documented frontal lobe brain injuries, as they are exhibiting all the signs of dangerous acquired sociopathy, per pro athlete brain injury specialist, World Brain Injury Congress Speaker, and APBPA Medical Director, Dr. Leighton Reynolds, leightonj@sbcglobal.net, (661) 478-0667.

Judge, I am hereby requesting as long a continuance, as can please be granted under these extreme extenuating circumstances outlined here, to officially respond to this litigation, and to hire appropriate counsel, if it is deemed ultimately necessary, after the involved multiple law enforcement agencies have concluded their active law enforcement investigations, involving this matter. There has been no income received, by me, in over 3 years due to me being catastrophically hurt at work, by my former boss, and my being deemed permanently 100% disabled from my work injury, and that this injury will most likely be fatal.

Mr. Fancher, as such, I'd like to request we please take a giant step back, especially from wasting APBPA funds or the Court's time, as there are no damages accrued by any of my actions or to ever be sought in my impoverished handicapped state, as I'm penniless and about to be homeless. I request that you begin to ask your clients to show you who legally elected them or approved their APBPA employment because it

is not any legal past or present APBPA Board Members. None of them elected or approve of your clients.

Let us please attempt to mediate this, without taking the Court's time, and racking up unnecessary legal fees, so you can please investigate your client's baseless claims and positions. It is clear, to the legal APBPA Board, that both Kameron Loe and Kevin Simmons, if those are your clients, are not actively employed by the APBPA legal Board, and were, in fact, both banned years ago, for their own documented malfeasance, within the organization, including in front of a female MiLB umpire who is the Director of APBPA's Women's Services, who lived in my home office for 1/2 a year in 2020, and traveled with me for years to baseball work meetings, and stayed in close proximity in my hotel rooms with me and as such, is prepared to back up the legal APBPA Board's accounts, also as a witness, and is also prepared to testify on the legal APBPA Board Member's behalf, against Mr. Fancher's clients. Umpire Perry Barber umpireplb@aol.com. (917) 673-6169

Mr. Fancher, myself, the legal APBPA Board Members, the APBPA Medical Director, and the APBPA umpire Women's Services Director believe, if you look at the APBPA evidence file, I'm providing to you now, you'll ultimately find you're solely being duped by two massively personally failed businessmen, one of who, Kameron Loe, has massive frontal lobe brain damage which we believe is a direct factor in how he believes he's above all laws, solely because he was a former MLB pitcher, and why he has his \$200,000 personal failed business judgment to pay off, that he can't pay with his own work efforts or merit, without illegally stealing from the APBPA assistance funds.

The legal Board Members of the APBPA are extremely confused by who is claiming to be them, as the APBPA, in this lawsuit before the Court, as they all stating they're not suing me, as I'm on the APBPA Advisory Board, at their request, during my medical leave.

As such, I hereby request, as much time as can be reasonably granted, to fully

investigate, who are the actual litigants in this matter, as if it is solely Kameron Loe and Kevin Simmons behind this, I request that the active Scottsdale Police, FBI, Dept of Justice, Maricopa County District Attorney, AZ Attorney General investigations, and the open US Bank fraud investigation into Mr. Francher's clients complete, as new evidence came to light this week and was submitted as of today, from the APBPA's assistance recipients, who rely on the APBPA to not go homeless, and they are actively begging, especially the AZ Attorney General to intervene, against these two, because they were never legally elected to the APBPA Board by any of the previous APBPA or current APBPA Board Members.

Mr. Francher, also, my workers comp lawyer is Shawn Stuckey, sstuckey@glennstuckey.com, (714) 644-8981, if you'd like to contact him as well to investigate my work injury, and your clients legal standing, and not just what they're verbally representing to you for their own benefit.

The current legal APBPA Board comprised of President Nate Miller, Howie Bedell, Tony La Russa, Lenny Randle, and Eric Lenaburg are extremely confused and alarmed by who is suing me, in this lawsuit, as they say it is not them.

Past Board Members from my Board as APBPA President from Dec, 2019-May, 2023, when Nate Miller was elected to replace me on medical leave, say they aren't suing me either, which was Howie Bedell, Tony La Russa, Tom Gamboa, Wes Parker, Fred Claire, Dusty Baker, and Brooks Robinson and Dick Beverage, both of whom have since passed on, but their last emails were supporting me and the legal APBPA Board, and not Mr. Fancher's clients.

If your clients cannot show you written votes for them, in a valid Board election, from 2019-2023, or any type of support by any of those listed here, there's 0 others who could legally grant them any legal employment access to the APBPA and it's funding, as those are the only legal APBPA Board Members in existence from 2019-now.

Finally, I'm not even permitted to do my medically prescribed physical therapy as my

constant tachycardia and bradycardia heart arrhythmias, caused by my injury, have been deemed unsafe to continue by Harper Physical Therapy. I'm begging for mercy from the Court and from you, Mr. Francher, as one must wonder why you'd choose to file a lawsuit against me instead of just reach out to me.

I'm penniless, and would never break laws within the APBPA, or with its logo usage, so the only other purpose of a lawsuit, is to affect the outcome of the multiple open law enforcement investigations, into your clients, for which they are facing prison time for illegally stealing assistance funding from the APBPA, which is what their paying your legal fees with currently instead of keeping 30+ families from being homeless.

Please talk to your clients, Mr, Francher. Please find out their true motives behind this lawsuit. The legal Board Members are certain you'll discover you're two clients are angry at me, for telling the truth about their friend, my former boss who catastrophically hurt me at work, and they're desperate for money after both their personal business did and are failing completely. Please look at Kevin Simmons, The Autograph Ball website. Please notice how the APBPA logo is the first thing one sees there. The Board does not authorize use of its logo for Kameron and Kevin to utilize on their personal work sites, nor to sell alcohol with no legal liquor license to do so, on the hacked Apbpa website.

Thank you for your time in this matter and for bearing with my injured and seriously handicapped efforts to comply with your requirements at this time. It's extremely embarrassing and devastating how non functional I am, so please work with me instead of terrorizing me with lawsuits, with no outcome possible, other than hurting a nonprofit and it's assistance recipients by taking funds for you and your client's own pockets without one APBPA Board Member, past or present, authorizing it.

Best regards,  
Jennifer Madison  
(480) 341-6558

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

## DEFENDANTS

County of Residence of First Listed Defendant Yavapai  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                                   |   | PTF                        | DEF                                   |
|---|----------------------------|---------------------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1            | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4            |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input checked="" type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6            |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input checked="" type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

11/14/23

Prose Defendant  
Jennifer Mordern

FOR OFFICE USE ONLY

RECEIPT #





AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

Madison, Jennifer  
33101 S Canyon Rd  
Black Cyn City, AZ  
85304

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